

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

REMBRANDT WIRELESS
TECHNOLOGIES, LP,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 2:19-cv-00025-JRG

JURY TRIAL DEMANDED

**DEFENDANT APPLE INC.'S MOTION TO JOIN RENEWED MOTION OF NON-
PARTIES BROADCOM INC. AND BROADCOM CORPORATION FOR A
PROTECTIVE ORDER, TO STRIKE, AND FOR ATTORNEYS' FEES**

Apple moves to join the Renewed Motion of Non-Parties Broadcom Inc. and Broadcom Corporation (collectively, "Broadcom") For a Protective Order, to Strike, and for Attorneys' Fees ("Broadcom's Motion," Dkt. No. 159).

Apple understands that Broadcom objects to disclosure of its confidential information to Dr. Morrow, and has asked the Court to enforce a prior stipulation between Broadcom and Plaintiff that prevents Dr. Morrow from discussing or opining on Broadcom's products in any litigation involving the asserted patents. Broadcom's Motion at 4-5. Broadcom also asks the Court to strike paragraph 244 of Dr. Morrow's infringement report, wherein Dr. Morrow discusses and opines on Broadcom's products. *Id.* at 5-7. Apple, as custodian of certain responsive, non-privileged documents containing Broadcom confidential information, produced Broadcom documents to Rembrandt in this case on which Dr. Morrow relies. Apple therefore joins Broadcom's Motion to the extent it seeks a protective order enforcing the Broadcom-Rembrandt stipulation and to the extent that it asks the Court for relief regarding paragraph 244 of Dr. Morrow's infringement report.

Dated: March 13, 2020

Respectfully submitted,

/s/ David E. Sipiora

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 13, 2020, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Stephannie Stover

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Apple has complied with the meet and confer requirement in Local Rule CV-7(h). This motion is opposed. The personal conference required by Local Rule CV-7(h) was conducted on October 3, 2019, October 23, 2019, and March 6, 2020 via telephone conference. No agreement could be reached because the parties disagree on the merits. Discussions have conclusively ended in an impasse, leaving an open issue for the court to resolve.

/s/ David E. Sipiora

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JURY TRIAL DEMANDED

**ORDER GRANTING DEFENDANT APPLE INC.'S MOTION TO JOIN RENEWED
MOTION OF NON-PARTIES BROADCOM INC. AND BROADCOM CORPORATION
FOR A PROTECTIVE ORDER, TO STRIKE, AND FOR ATTORNEYS' FEES**

Before the Court is Defendant Apple Inc.'s Motion to Join Renewed Motion of Non-Parties Broadcom Inc. and Broadcom Corporation for a Protective Order, to Strike, and for Attorneys' Fees. The Court, having considered the same, is of the opinion the motion should be GRANTED.